

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

**COUNTERCLAIM PLAINTIFF PEOPLE FOR THE ETHICAL TREATMENT OF
ANIMALS' INTERROGATORIES TO COUNTERCLAIM
DEFENDANT ANDREW SAWYER**

Pursuant to Federal Rule of Civil Procedure 33, Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott propound the following interrogatories to Counterclaim Defendant Andrew Sawyer, to be answered, and verified, in accordance with the federal and local rules and within thirty days of service hereof.

DEFINITIONS

The words “you” and “your” shall mean Andrew Sawyer and anyone acting as your representative(s) and/or on your behalf with respect to the matters that are the subjects of these interrogatories.

“Joey” shall mean the chimpanzee owned by you, who was previously confined at Missouri Primate Foundation.

INTERROGATORIES

Interrogatory No. 1. Identify all locations where Joey has been confined since November 2, 2010.

RESPONSE:

Interrogatory No. 2. With respect to each location identified in response to Interrogatory No.1, state the reason(s) why Joey did not remain at that location.

RESPONSE:

Interrogatory No. 3. Identify all persons with knowledge of the circumstances and reasons why Joey was moved to and/or from each of the locations identified in response to Interrogatory No. 1.

RESPONSE:

Interrogatory No. 4. If you contend that while Joey was confined at Missouri Primate Foundation, he was provided with adequate opportunities for social interactions typical of his species, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 5. If you contend that presently, Joey is being provided with adequate opportunities for social interactions typical of his species, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 6. If you contend that while Joey was confined at Missouri Primate Foundation he was provided with adequate species-appropriate psychological and environmental enrichment or stimulation, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 7. If you contend that presently, Joey is being provided with adequate species-appropriate psychological and environmental enrichment or stimulation, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 8. If you contend that while Joey was confined at Missouri Primate Foundation, he was kept in a sanitary environment, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 9. If you contend that presently, Joey is kept in a sanitary environment, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 10. If you contend that while Joey was confined at Missouri Primate Foundation, he was provided a wholesome and nutritious diet, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 11. If you contend that presently, Joey is provided a wholesome and nutritious diet, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 12. If you contend that while Joey was confined at Missouri Primate Foundation, he received adequate veterinary care, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 13. If you contend that presently, Joey receives adequate veterinary care, state all facts on which you base your contention.

RESPONSE:

Interrogatory No. 14. Identify every veterinarian or other animal health care practitioner who has examined, evaluated, treated, or been consulted about, Joey, during the past five years.

RESPONSE:

Interrogatory No. 15. Identify each person who was consulted, or who has provided substantive information in connection with responding to these Interrogatories.

RESPONSE:

Interrogatory No. 16. Identify by name and last known address, all persons who are presently or in the past five years were involved in caring for Joey (including feeding him, monitoring his health, and maintaining and cleaning his enclosures).

RESPONSE:

Interrogatory No. 17. Identify all sources and expert information you consulted or considered in order to determine what conditions of confinement are sufficient to meet the needs of chimpanzees in captivity, and state the date(s) you first learned of the information.

RESPONSE:

Interrogatory No. 18.

Identify all signs and symptoms of which you are aware that may indicate that a chimpanzee in captivity is suffering from stress, trauma, or other aspects of poor mental health.

RESPONSE:

Dated: June 6, 2018

Respectfully submitted,

/s/ Martina Bernstein
MARTINA BERNSTEIN (#230505CA)
PETA Foundation
1536 16th St. NW
Washington, DC 20036
202.483.7382
Fax No: 202.540.2208
martinab@petaf.org

JARED S. GOODMAN (#1011876DC)
(Admitted *pro hac vice*)
PETA Foundation
2154 W. Sunset Blvd.
Los Angeles, CA 90032
323.210.2266
Fax No: 213.484.1648
jaredg@petaf.org

POLSINELLI PC
JAMES P. MARTIN (#50170)
KELLY J. MUENSTERMAN (#66968)
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
314.889.8000
Fax No: 314.231.1776
jmartin@polsinelli.com

*Attorneys for Defendants/
Counterclaim Plaintiffs*

VERIFICATION

I, _____, hereby verify under penalty of perjury under the laws of the United States of America that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Executed on _____, 2018.

Name

Title

CERTIFICATE OF SERVICE

I certify that on June 6, the foregoing interrogatories were served by electronic mail and regular mail as follows:

Geordie Duckler, geordied@animallawpractice.com
Attorney for Plaintiff/Counterclaim Defendant Andrew Sawyer

Brian Klar, bklar@lawsaintlouis.com
Daniel T. Batten, dbatten@lawsaintlouis.com
Attorneys for Plaintiff/Counterclaim Defendant Connie Braun Casey

Missouri Primate Foundation
c/o Connie Braun Casey
12338 State Rd. CC
Festus, MO 63028

Vito Stramaeglia
ICS
832 Jones Creek Rd.
Dickson, TN 37055

/s/ Jared Goodman